

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

M.A.P.S., on her own behalf and on behalf of  
others similarly situated,

*Petitioners–Plaintiff,*

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

*Respondents–Defendants.*

Case No. 3:25-cv-00171-DB

**RESPONDENTS-DEFENDANTS’ NOTICE OF OBJECTION**

On May 22, 2025, this Court consolidated the hearing on Petitioner-Plaintiff’s motion for preliminary injunction and order to show cause with a trial on the merits. ECF No. 37. Respondents-Defendants object to consolidation. The administration has not implemented a new notice policy on remand from *A.A.R.P. v. Trump*, 605 U.S. ---, 2025 WL 1417281 (2025) and thus a final resolution of the case on the merits is premature.

Respectfully Submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General  
Civil Division

ANTHONY NICASTRO  
Acting Director

SARAH WILSON  
Assistant Director

/s/ Daniel M. Cappelletti  
DANIEL M. CAPPELLETTI  
Trial Attorney

NANCY N. SAFAVI  
TX Bar No. 24042342  
Senior Trial Attorney

Dated: May 28, 2025

*Counsel for Respondents–Defendants*

**CERTIFICATE OF SERVICE**

I certify that on May 28, 2025, a true and correct copy of the foregoing was filed with the United States District Clerk for the Western District of Texas and electronically served on all counsel of record via the District's ECF system and email.

/s/ Daniel M. Cappelletti  
DANIEL M. CAPPELLETTI  
Trial Attorney